NARA Bulletin 2005-05   **April 20, 2005**

TO: Heads of Federal agencies

SUBJECT: Guidance for flexible scheduling

EXPIRATION DATE: April 30, 2007

1. <u>What is the purpose of this bulletin?</u> The purpose of this bulletin is to provide information to agencies that want to create flexible "big bucket" or large aggregation schedules for their records or wish to use flexible retentions for record disposition.

2. <u>What must heads of Federal agencies do to implement this bulletin?</u> This guidance provides a practical approach to creating "big bucket" or large aggregation flexible schedules in a Federal agency. It explains when it is appropriate to use "big buckets" or large aggregation schedules or flexible retentions.

3. <u>What is a traditional schedule?</u>

    a. A traditional schedule shows as separate items agency records series and systems, which are individually scheduled for appropriate disposition. A series or electronic system is the basic unit for organizing and controlling files. It is a group of files or documents kept together (either physically or intellectually) because they relate to a particular subject or function, result from the same activity, document a specific type of transaction, take a particular physical form, or have some other relationship arising out of their creation, receipt, maintenance, or use (36 CFR 1220.14).

    b. A traditional schedule is usually arranged primarily by organization or function. Organizational arrangement is a hierarchical listing arranged by name of organizational unit (by each bureau or other major unit and thereunder by its subordinate units). It shows as separate items the record series and systems maintained by each major and subordinate unit. To prevent confusion, agencies need to update schedules promptly after internal reorganization either by amending them when the changes do not affect the nature, content, and functional importance of the records or by submitting an SF 115 when they do. Functional arrangement combines series or systems serving the same purpose, although each series or system is scheduled as a single item with its disposition. Records described in the schedule items are covered regardless of where they are created and maintained. For example, many of the General Records Schedules are arranged by function. A functional approach may be suitable for a number of offices performing the same work.

4. <u>What is flexible scheduling?</u> Flexible scheduling provides for concrete disposition instructions that may be applied to groupings of information and/or categories of records.

Flexibility is in defining the record groupings, which can contain multiple records series and electronic systems. The difference from the traditional scheduling approach is that the unit to be scheduled is not the individual records series or an electronic system, but all records in all media relating to a work process, group of related work processes, or a broad program area to which the same length of retention should be applied.

5. What is a "big bucket" or large aggregation schedule? A "big bucket" or large aggregation schedule is a type of flexible schedule. Flexible scheduling using "big buckets" or large aggregations is an application of disposition instructions against a body of records grouped at a level of aggregation greater than the traditional file series or electronic system that can be along a specific program area, functional line, or business process. The goal of this type of flexible scheduling is to provide for the disposition of records at a level of aggregation that best supports the business needs of agencies, while ensuring the documentation necessary to protect legal rights and ensure government accountability. See the attachment for several examples of "big bucket" schedules.

6. What is flexible retention?

     a. Flexible retention is an arrangement and disposition tool that can be applied to individual or groups of record series or electronic systems to establish consistent retention periods. This allows for series or electronic systems within work process functions to have the same stated minimum and/or maximum retention periods. Flexible retention is a flexible scheduling tool that can be used as a component of a "big bucket" or large aggregation schedule or in a traditional series based schedule and gives agencies the retention flexibility they need to manage their records.

     b. Traditionally, the disposition instructions in schedules for temporary records provide for the disposal of records after a fixed period of time or an event (e.g., destroy when 3 years old, destroy 2 years after employee separates, etc.). As a result, whenever business needs dictate a change in the retention period for a previously scheduled temporary series, agencies must submit a schedule to NARA. To ease this burden, we now encourage agencies to propose flexible retention periods for records when appropriate.

     c. To provide retention flexibility, the disposition instructions in a schedule may:

        (1) Specify a mandatory minimum retention period for records, but allow for continued retention beyond that time. Example - Destroy when 3 years old. Longer retention is authorized if records are still needed for business purposes.

        (2) Specify a time band that provides both minimum and maximum retention periods for records. Example - Destroy when records are no less than 3 years old but no more than 6 years old.

        (3) Authorize the disposal of records when no longer needed for business purposes. Example - Destroy when records are no longer needed. Note: This disposition is generally appropriate only in the case of records that are not needed for any purpose (e.g., protection of legal rights, audits, etc.) other than an agency's day to day business.

7. <u>When can a "big bucket" or large aggregation flexible schedule be used?</u> There are several considerations that help determine when it is most appropriate to use a "big bucket" or large aggregation flexible schedule:

a. The agency can clearly identify its mission and the work processes or business functions that allow it to accomplish that mission and wants to manage its records in the context of its work process or business functions.

b. The agency wants to simplify all or part of its records control schedule by providing consistent or uniform disposition instructions (e.g. "harmonizing" disposition) to bodies of like records.

c. The agency is able to clearly identify records in each business process or functional area in all media and all formats.

d. The agency wants to manage their records in the context of their work processes or business functions rather than by individual records series or electronic systems.

e. The agency is in need of simplifying all or part of its business processes, and wishes to reduce the number of individual disposition instructions to ensure proper management of its records.

f. The agency is considering adopting a records management application (RMA) and managing records in larger aggregations will simplify recordkeeping for individual staff.

g. When organizational changes or changes in work methods are frequent, but the underlying function and purpose of the records does not change or remains substantially the same.

8. <u>When should a "big bucket" or large aggregation flexible schedule be approached cautiously?</u> A "big bucket" or large aggregation flexible schedule should be approached cautiously when:

a. The agency prefers to manage its records in a traditional series-by-series, system-by-system approach, and has determined that the traditional method of managing its records is sufficient for its business needs and assures the creation of adequate and proper documentation.

b. The agency does not possess a sufficient level of control over its records to group them by agency functions and business processes.

c. The agency is in a state of flux, and business processes and workplace cultures and methods of performing work are not well defined or uniform procedures are not in place.

d. The agency business process(es) are comprised of a high percentage of permanent records that are high profile or high risk that might not be identified and managed appropriately in aggregated buckets.

(1) This situation does not require agencies to forego flexible scheduling, but they must proceed with caution. An agency in this situation must define the level of risk— i.e., the degree to which records are in danger of improper disposition– before proceeding. An agency may identify some areas within the organization that are good "big bucket" or large aggregation candidates and other areas where traditional records management best meets its business needs.

(2) Permanent buckets or aggregations would prove particularly useful for managing the records of agencies whose mission or work functions are well defined and relatively stable and may prove extremely valuable when dealing with electronic records.

e. The agency is unlikely to commit the proper time and resources to the creation of a flexible schedule and then the implementation of that schedule.

9. What are the advantages of a "big bucket" or large aggregation flexible schedule? A "big bucket" or large aggregation flexible schedule:

a. Allows agencies to schedule records at a level of aggregation that meets its business needs.

b. Simplifies disposition instructions in a way that may be more useful to agencies implementing an RMA.

c. Simplifies managing agency records by synchronizing retentions and dispositions of records in the context of their work processes or business functions rather than by individual records series or electronic systems.

d. May reduce the need to resubmit schedules for new and unscheduled records as long as they are included in a previously scheduled business process.

10. What are some additional considerations for developing a "big bucket" or large aggregation flexible schedule?

a. As systems and series change over time, records managers may need to maintain the detailed level of intellectual control that was previously accomplished through traditional scheduling techniques so that they can track new series and systems as well as those that are changing.

b. Flexible scheduling may not help agency staff and records managers establish appropriate methods to arrange, file, manage, and locate records in offices where recordkeeping relies on traditional records series.

11. How do you develop a "big bucket" or large aggregation flexible schedule? Use the following steps to develop a "big bucket" or large aggregation flexible schedule:

a. Determine if a "big bucket" or large aggregation flexible schedule meets agency business needs and ensures adequate and proper documentation. An agency with reliable

existing schedules might review them to determine if existing records series can be grouped into "big buckets" or large aggregations. Contact the NARA appraisal archivist for the agency for consultation and guidance.

      b. Conduct functional or business process analysis. Determine the functions or processes performed by organization or unit. Business process analyses and workflows may already exist and, if so, would be useful tools in developing a flexible schedule.

          (1) Study the work processes and functions of the agency and program offices to ascertain logical groupings of records.

          (2) Review relevant parts of agency manuals or record schedules for changes such as reorganizations, name changes, and elimination of programs and functions.

          (3) If the business processes are being improved or dramatically reengineered, it would be advantageous to piggyback on that work since the business process analysis will be occurring anyway. This might also be an opportunity to inject records management requirements into the business process redesign.

      c. Identify records series that come from work process(es).

          (1) Interview staff responsible for or involved with each identified function to determine all series related to each function. Also, use existing record schedules to determine all series related to each function and then interview staff for accuracy and to discover unscheduled or unknown series pertaining to each function.

          (2) Conduct a physical review of a representative sample of the records.

          (3) For each identified series determine:

              (i) Workflow that creates or uses the records

              (ii) Location

              (iii) Format

              (iv) Volume

              (v) Whether records are temporary or permanent

              (vi) Retention

          (4) Use agency data and technical tools at your disposal in accomplishing the task.

              (i) Create or use existing databases to track information and ensure proper intellectual control.

(ii) Locate and use internal reports, which present a clear picture of types and locations of records.

d. Determine values for records series and/or larger groupings of records

(1) Determine levels of control – function or subfunction at which to keep records and apply disposition.

(2) Determine retention period for each level of control.

(3) Identify subfunctions and assign them to higher-level functions when possible.

e. Group like record series into larger aggregations or buckets.

(1) Segregate records on the basis of retention and disposition, i.e. place like records together within buckets or aggregations, permanent records with permanent records and temporary records with temporary records.

(2) Identify those series, systems, or groups of records, if any, requiring use of traditional scheduling methods.

f. Name larger aggregations or buckets. Review names of the aggregations or buckets for clarity, completeness, and conciseness.

g. Determine value of records within each aggregation, bucket, or series.

(1) Develop crosswalk from records with previously approved dispositions to new buckets or aggregations.

(2) Harmonize retentions and dispositions – either by assigning one disposition to all records within a bucket or aggregation or by proposing flexible retention periods for records when they are appropriate (par. 8).

(3) Choose a primary bucket or aggregation location for any records that could fall into multiple buckets or aggregations.

h. Submit schedule to NARA. To assist NARA in processing the schedule, submit documentation accumulated during the schedule development process, such as crosswalks to previously approved schedules, materials that document the agency's business process analysis if one is conducted, and information concerning the specific file units subsumed under each aggregation, bucket, or series.

12. Is assistance available from NARA?

a. NARA's Life Cycle Management Division provides assistance and advice to agency records officers in the Washington, DC, area. Your agency's records officer may contact the

NARA appraiser or records analyst with whom your agency normally works. A list of the appraisal and scheduling work groups is posted on the NARA web site at http://www.archives.gov/records_management/policy_and_guidance/appraisal_and_scheduling.html.

      b. The Records Management staff in NARA's regional offices provides assistance to records officers across the country. A complete list of NARA regional facilities may be found at http://www.archives.gov/facilities/index.html.

ALLEN WEINSTEIN
Archivist of the United States

Attachment